

U.S. DEPARTMENT OF EDUCATION

Enhanced Assessment Grants



Discretionary Grant

Administration

-- Overview for EAG Grantees

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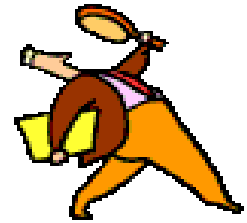
Enhanced Assessment Grants

Presentation Topics:

- Discretionary Grant Administration
- Grant Monitoring for EAGs
- Project Revisions
- Closeout
- Resources



Grant

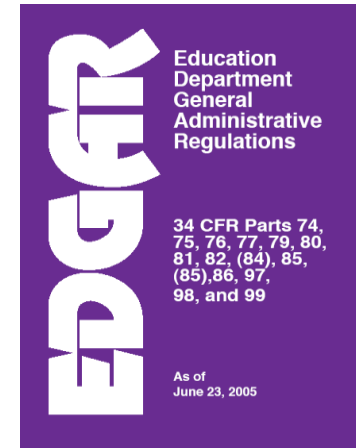


Administration

GRANT ADMINISTRATION

Tools of the Trade

- Legislation
- EDGAR
- OMB Circulars & Cost Principles in the Code of Federal Regulations (CFRs)
- Government Performance and Results Act (GPRA)
- Approved Application and Grant Award Notification (GAN), including terms and conditions, (See www.ed.gov/programs/eag/resources.html)



GRANT ADMINISTRATION

Tools of the Trade

- Administrative Requirements
 - EDGAR, 34 CFR Part 80 (Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments)
- Cost Principles
 - OMB Cost Circular A-87, Cost Principles for State, Local and Indian Tribal Governments (relocated to 2 CFR, Part 225)

GRANT ADMINISTRATION

Tools of the Trade

GPRA - Under the Government Performance And Results Act (GPRA), performance indicators have been established for the EAG Program that:

- Are listed in the application package and reporting instructions for grantees
- Must be reported on by grantees in annual and final performance reports
- Tie Federal funding to results by rating the effectiveness of the EAG Program

GRANT ADMINISTRATION

Staff

- Grantee
 - As stated in approved package
 - Project Director and other key personnel listed on Grant Award Notification (GAN)
- U.S. Department of Education (ED) Staff
 - EAG Program Staff
 - EAG Staff Monitors



GRANT ADMINISTRATION

Grantee Major Responsibilities

- Conform to goals and objectives in the grantees approved EAG application
- Make progress against performance measures in the approved application (EDGAR §80.40)
- Ensure quality and effectiveness of project outcomes (EDGAR §80.40)



GRANT ADMINISTRATION

Grantee Major Responsibilities

- Submit annual and final performance and financial reports (EDGAR §80.50)
- Maintain administrative and fiscal accountability (EDGAR §80.20)

GRANT ADMINISTRATION

Major Recordkeeping Responsibilities

Maintain on-site:

- Funded application and grant award documents
- Project revision documentation
- Annual and final performance reports
- Monitoring reports from ED, as applicable

EDGAR §80.42

GRANT ADMINISTRATION

Major Recordkeeping Responsibilities

Maintain onsite (con't):

- Monthly budget and personnel list (see budget management section)
- Maintain grant records for 3 years after final submission of all required reports, and longer if audit or legal issues require resolution (EDGAR §80.42(b)(1 thru 4))



GRANT ADMINISTRATION

Procurement Standards

For awarding contracts under an EAG, grantees should use their own procurement standards which reflect applicable State and local laws and regulations provided that The procurements conform to the applicable Federal law and the standards identified in (EDGAR §80.36)

GRANT ADMINISTRATION

Procurement Standards

Procurement under an EAG should involve:

- Detailed records (EDGAR §80.36(b)(9))
- Use of the appropriate contract type
- Have appropriate competitive procurement methods (EDGAR §80.36(d)(3))
- Have appropriate non-competitive procurement methods (sole source) (EDGAR §80.36(d)(4))

GRANT ADMINISTRATION

Contract Administration System

- Grantee must maintain a contract administration system which ensures that contractors perform in accordance with the terms, and conditions, and specifications of their contracts or purchase orders.
- This includes a plan for monitoring contractor performance and for ensuring all contracts under the grant are implemented in compliance with applicable requirements.

EDGAR § 80.36(b)(2)



GRANT ADMINISTRATION

Contract Administration System

- Contract Administration System
(EDGAR §80.36(b)(2))
- Written Code of Conduct
(EDGAR §80.36(b)(3))
- Foster Economy and Efficiency
(EDGAR §80.36(b)(5))
- Use only responsible contractors
(EDGAR §80.36(b)(8))

GRANT ADMINISTRATION

Management Systems

- Follow State financial management rules and regulations (EDGAR §80.20(a))
- Keep records related to grant funds (EDGAR §80.20(b)(2))
- Support accurate, current and complete financial reporting (EDGAR §80.20(b)(1))
- Adhere to established internal controls (EDGAR §80.20(c))

GRANT ADMINISTRATION

Budget Management

- Grantee keeps the required records related to grant funds and meets requirements for financial reporting (EDGAR §75.730, §75.720 & §80.41; EAG Monitoring Indicator 4.7)
- Grantee uses fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for Federal funds, and has in place and follows standards for financial management systems (EDGAR §75.702, §80.20 & §80.21; EAG Monitoring Indicator 4.8)

GRANT ADMINISTRATION

Budget Management

Internal Controls - Procedures for expending funds for (ED Form 524):

- Personnel
- Fringe
- Travel
- Equipment
- Supplies
- Contractual
- Other
- Indirect Costs
- Training Stipends

GRANT ADMINISTRATION

Budget Management

Claimed costs must be:

- Allowable - permitted or not specifically prohibited
- Allocable - necessary for project's success
- Reasonable - costs that would be incurred by a “prudent” person

**2 CFR Part 225
(OMB Cost Circular
A-87)**

GRANT ADMINISTRATION

Budget Management: Payments

- Grantee's "drawdown" policies and processes must (EDGAR §80.20(b)(7) and §80.21):
 - Request funds only for immediate needs
 - Minimize time between requests and expenditures
 - Draws should be commensurate with project completion or accomplishments

GRANT ADMINISTRATION

Budget Management

- Examples of internal controls
 - Project ledger
 - Reconcile ledger with business office
 - Frequency
 - Separation of duties
 - Written policies and procedures

GRANT ADMINISTRATION

Budget Management

Personnel: Internal Controls

- Time and Attendance Certification
 - Maintained for grant's staff
 - Reflects total activity
 - Signed by staff and supervisor
 - Prepared by pay period
 - Reflects the application

**2 CFR Part 225
(OMB Cost Circular
A-87)**

GRANT ADMINISTRATION

Budget Management

Travel: Internal Controls

- Written policies and procedures
- Pre- and post-trip authorizations
- Budget management

**2 CFR Part 225
(OMB Cost Circular
A-87)**



GRANT ADMINISTRATION

Budget Management

EDGAR §80.36

Contractual: Internal Controls

For payments to contractors, a grantee should:

- Pay a contractor only when work for which the grantee is paying for is complete.
- Keep records that document expenses paid for under the contract.
- Monitor charges by contractors (e.g., review invoices).
- Not draw down funds until the grantee is ready to disburse the funds (i.e., within the next three days).
- Minimize the amount of time between when funds are drawn down and paid out.

GRANT ADMINISTRATION

Budget Management

Equipment and Supplies: Internal Controls

- ✎ Definitions consistent with institution's policy
- 📁 Provide per unit cost for Equipment
- ✂ Maintain control through inventory records

EDGAR \$80.32

GRANT ADMINISTRATION

Budget Management:

Indirect Costs: Internal Controls

- Also called “facilities and administration” or F&A
- No universal rule for classifying certain costs as either direct or indirect
- If a State treats a particular cost as indirect for one Federal award, must apply to any others
- Project director must understand what cost items are included in the indirect cost rate



GRANT ADMINISTRATION

Budget Management: A-133 Audits

- Cost Circular A-133 Audits are required for any agency that expends over \$500,000 in Federal funds for a fiscal year.
- Generally A-133 Audits are considered to be in the category of items paid for with indirect costs.

GRANT ADMINISTRATION

Final Products

- ED requires the inclusion of a special disclaimer on any publication developed with grant funds, such as
 - EAG products:
 - Editorials, reports, films, etc.
 - Any publication containing project materials

EDGAR \$75.620

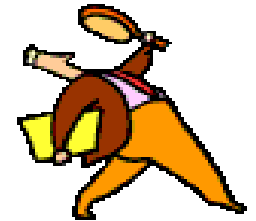
GRANT ADMINISTRATION

Final Products: Sample Disclaimer

“The contents of this (insert type of publication) were developed under a grant from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education and you should not assume endorsement by the Federal government.”



Grant



Monitoring

GRANT MONITORING

What ED Looks for:

- Substantial progress and accomplishment of project goals and objectives
- GPRA indicators are being met
- Good recordkeeping and fiscal accountability

**Maintain
Communication with
your ED Staff Monitor
on EAG Progress**

GRANT MONITORING

How EAG Grants are monitored:

- On-going Desk Monitoring (e.g., informal, periodic communication with ED staff)
- ED reviews of GAPS/G5 drawdowns
- Annual and Final Performance Reports
- Augmented Desk Monitoring
(Selected Grants)

GRANT MONITORING

On-going Desk Monitoring

- Update on:
 - Progress against stated goals of the EAG
 - Status of budget (e.g., GAPS drawdown reports)
 - Issues regarding grant administration
 - Internal, external challenges
 - Proposed revisions to grant (e.g., change in key personnel) (see project revisions section)
 - Work among collaborators

GRANT MONITORING

Monitoring Using GAPS/G5

Tracks spending patterns for each grant



Why:

- Identify performance issues
- Identify financial issues

GRANT MONITORING

GAPS Monitoring Report

ED's Concerns:

- Excessive drawdowns
- Large amounts of unobligated funds
- Either excessive or infrequent requests for funds
- Project goals not met/Project activity does not correspond with drawdowns

GRANT MONITORING

Performance Reporting

Document project's success and financial accountability

- Project's success and financial accountability/data
- Comparison of actual accomplishments with measurable goals and objectives
- Financial data
- Submit annual performance report using ED 524B and following instructions
- Final Performance Report using ED 524B within 90 days of end of grant period and following instructions

ED sends letters with instructions, forms and due date

EDGAR \$80.40

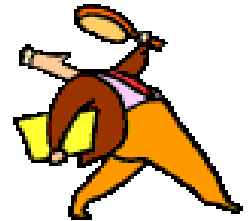
GRANT MONITORING

Augmented Desk Monitoring

- More in-depth monitoring for selected grants
- Uses monitoring indicators outlined in ED's *Monitoring Plan* for the EAG Program (see www.ed.gov/programs/eag/resources.html)



Project



Revisions

PROJECT REVISIONS

Prior approval required for:

- Changes in project scope or objectives (generally not permitted)
- Transfer or contracting out of any work other than as described in original application

**EDGAR \$75.264
& \$80.30**

PROJECT REVISIONS

Time Extensions

For one-time extension up to one year

- Grantee sends written notice including:
 - Reasons for extension
 - Revised expiration date
 - No later than **10 days** before project ends

For second extensions

- Contact staff monitor to discuss

EDGAR \$75.261



PROJECT REVISIONS

Time Extensions (con't.)

Time extensions:

- Cannot be merely for the purpose of using unexpended funds
- Must not require additional Federal funds
- Cannot change the scope or objectives of project

PROJECT REVISIONS

Budget Transfers in Line Item Categories

No prior approval required for most budget transfers

- Exceptions listed in EDGAR §75.264 (referencing §74.25) including transfer or contracting out of any work other than as described in original application, and transfer of amounts from indirect to direct cost categories and vice versa.

CLOSEOUT

- ED sends letters with instructions, forms and due date
- Final Performance Report (include final products from grant with final performance report)
- Final Financial Data submitted and consistent with GAPS
- Notification of Closeout in Compliance (or Noncompliance)

EDGAR §80.50

RESOURCES

- Program website: www.ed.gov/programs/eag
- Resources page of EAG website includes:
 - EDGAR
 - OMB Cost Principle Circulars
 - OMB Circular A-21, *Cost Principles for Educational Institutions* (now 2 CFR Part 220)
 - OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments* (now 2 CFR Part 225)

RESOURCES

- Resources page of EAG website includes (con't.):
 - *Grantmaking at ED:*
 - *Online Grantee Training*
 - *GAPS User's Guide* (Recipients only – requires access code)
 - Payee hotline for GAPS – 1-888-336-8930 (TTY: 1-866-697-2696)
 - Other helpful links!

QUESTIONS ?

For additional information or questions, contact:

- Your EAG's ED staff monitor
- EAG program staff
 - Sharon Hall: 202-260-0998 and Sharon.Hall@ed.gov
 - Collette Roney: 202-401-5245 and Collette.Roney@ed.gov

OUR CARDS

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THANK YOU!